

1 George Haines, Esq.
2 Nevada Bar No. 9411
3 FREEDOM LAW FIRM, LLC
4 8985 S. Eastern Ave., Suite 350
5 Las Vegas, NV 89123
6 Phone: (702) 880-5554
7 FAX: (702) 385-5518
8 Email: ghaines@freedomlegalteam.com
9 Attorney for Debtor

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

STEVEN E. DURHAM,

Debtor.

Case No. 19-17961-abl

Chapter 13

Hearing

—

Date: November 18, 2020

Time: 9:30 a.m.

Judge: Hon. August B. Landis

**STIPULATION ADJOURNING DEBTOR'S MOTION TO DETERMINE FUNDBOX'S
VIOLATIONS OF THE AUTOMATIC STAY AND REQUEST TO RECOVER ACTUAL
DAMAGES, ATTORNEY'S FEES AND COSTS, AND PUNITIVE DAMAGES**

Debtor, by and through her attorney of record George Haines of the law firm of
FREEDOM LAW FIRM, LLC and Creditor, FUNDBOX , by and through its attorney of record
Jennifer L. Dering of the law firm of TENAGLIA & HUNT, P.A. (collectively, the "Parties")
agree and stipulate as follows:

1. The Parties have agreed to engage in a mediation of this matter.
2. Debtor's Motion to Determine Fundbox's Violations of the Automatic Stay and
Request to Recover Actual Damages, Attorney's Fees and Costs, and Punitive Damages (ECF No.
61) (the "Motion for Sanction") is currently set for hearing on November 18, 2020 at 9:30 a.m.

1 3. In an effort to continue to conserve the Parties' and judicial resources, the Parties
2 agree to continue briefing and the hearing on the Motion for Relief while they continue their
3 settlement discussions.

4 4. As such, the Parties agree to continue the hearing on the Motion for Sanctions to
5 January 20, 2021 at 9:30 a.m.

6 5. Creditor's deadline to respond to the Motion for Sanctions shall be extended to
7 fourteen (14) days prior to the new hearing set by the Court.

8 6. Debtor's Reply to Creditor's Opposition shall be extended to seven (7) days prior
9 to the new hearing set by the Court.

10 7. The Parties do not make this request for the sole purpose of delay.

11
12 Dated: November 14, 2020

Dated: November 14, 2020

13
14 FREEDOM LAW FIRM, LLC

TENAGLIA & HUNT P.A.

15 BY: /s/George Haines
16 George Haines
17 8985 South Eastern Avenue, Suite #350
18 Las Vegas, NV 89123

BY: /s/ Jennifer L. Dering
Jennifer L Dering, Esq
1521 Concord Pike, Ste 301
Wilmington, DE 19803